

In the Matter of: )  
 )  
Amendment of Part 74 of the Commission's )  
Rules Regarding FM Translator Interference )  
MB Docket 18-119 )

## COMMENTS

Bishop supports the proposal to allow licensees to move to any available channel as a minor modification as a way to solve interference issues. However, this may result in a translator licensee actually looking for problems just so they may move to a desired frequency. Therefore Bishop proposes translator licensees should not have to wait for an interference complaint to be able to move to any available channel as a minor modification providing the new frequency fits technically. Furthermore, licensees should be able to move translators anywhere within the primary station's legal contour and not worry about whether the 60 dBu predicted contours of the licensed translator and the proposed translator intersect. It would save time and money for everyone if the rule was changed so translator licensees can move to any desired frequency as a minor modification whether there are interference complaints or not.

Bishop supports that there should be a predicted contour, outside of which, interference complaints will not be accepted. Given the sensitivity of radios, especially in automobiles, that contour should be 48 dBu rather than the 54 dBu as proposed in the NPRM. A significant amount of FM listening is in automobiles and many listeners can receive an FM signal to 48 dBu and beyond. Limiting a full power station's or a secondary service station's remedy to the 54 dBu contour does not take into account technical improvements in automobile receivers. Therefore, Bishop believes the 48 dBu contour would better protect the technical integrity of the FM band.

Bishop supports the changes in wording that the relevant rules apply to all full service stations and previously authorized secondary service stations. With the number of new translators

recently authorized there is more likely to be “actual” interference issues between two translators rather than a full-service FM and a translator. AM licenses are depending on these translators to revitalize their stations. This wording gives translator licensees some level of protection without designating translators as primary services.

F. Alternative and/or Additional Approach

As part of this rulemaking Bishop proposes Class A and Class B1 FM stations should be allowed to locate translators so the predicted 60 dBu of the translator does not go beyond the predicted 54 dBu of the primary station. Currently Class A FM’s are limited to locating translators within their 60 dBu signals and Class B1 FM’s within their 57 dBu. Should these class of stations lose their ability to remedy interference complaints beyond a certain predicted contour, expanding the area where they can locate a translator may help mitigate interference issues. Specifically this proposal would help Class A FM’s that are starting to get “lost in the shuffle”. The recent “25 mile rule” that allows AM stations to locate translators so their predicted 60 dBu contour does not exceed 25 miles, or 40 kilometers, now gives AM stations a 12 kilometer advantage over Class A FM’s. Bishop proposes “leveling the playing field” when determining where stations may locate translators and believes it should be part of this rulemaking as opposed to any separate NPRM.

Respectively Submitted,

Alan Bishop  
7/22/18